

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CHRISTOPHER MACHADO, and
MICHAEL RUBIN, individually and on
behalf of all others similarly situated,

Plaintiffs,

No. 15-cv-11775-GAO

v.

ENDURANCE INTERNATIONAL GROUP
HOLDINGS, INC., HARI
RAVICHANDRAN, and TIVANKA
ELLAWALA,

Defendants.

JOINT STATUS REPORT AND MOTION TO CONTINUE STAY

Lead Plaintiff Christopher Machado and Plaintiff Michael Rubin (collectively, “Plaintiffs”), and Defendants Endurance International Group Holdings, Inc., Hari Ravichandran, and Tivanka Ellawala (collectively, “Defendants,” and together with Plaintiffs, the “Parties”), through their undersigned counsel, respectfully submit this joint status report to (i) update the Court on the Parties’ discussions relating to a possible resolution of this matter; and (ii) request that the Court continue the stay of all proceedings for an additional sixty (60) days.

On January 12, 2018, the Parties filed a joint motion to stay all proceedings in this matter pending the outcome of the Parties’ mediation, which was scheduled for February 23, 2018.

Dkt. No. 64.

On February 21, 2018, the Court granted the stay and ordered the Parties to inform the Court of the outcome of the mediation no later than March 5, 2018. Dkt. No. 65.

On February 23, 2018, the Parties participated in an in person, all-day mediation with the Honorable Daniel Weinstein (Ret.). The matter was not resolved that day, but the Parties continued to discuss settlement with the assistance of Judge Weinstein.

The Court subsequently extended the stay to allow the Parties to continue their discussions and ordered the Parties to file a status report on or before May 7, 2018. Dkt. No. 74.

Since the last status report, with the assistance of Judge Weinstein, the Parties have made significant progress towards resolving this matter and anticipate that they will be able to file with the Court a motion seeking preliminary approval of a proposed settlement agreement within sixty (60) days.

In order to conserve the resources of the Court and to facilitate the Parties' ongoing efforts to resolve the matter, the Parties respectfully request that the Court continue the stay of the proceedings for an additional sixty (60) days. If this motion is granted, the Parties will file an appropriate motion to the Court on or before July 6, 2018.

WHEREFORE, the Parties respectfully request that the Court continue the stay of this action until the Parties file an appropriate motion on or before July 6, 2018.

Dated: May 7, 2018

**PLAINTIFFS CHRISTOPHER MACHADO
AND MICHAEL RUBIN**

By: /s/ Jason M. Leviton
Jason M. Leviton (BBO #678331)
Block & Leviton LLP
155 Federal Street, Suite 400
Boston, MA 02110
Telephone: (617) 398-5600
Facsimile: (617) 507-6020
jason@blockesq.com

Lionel Z. Glancy
Robert V. Prongay
Jason L. Krajcer
Charles H. Linehan
Glancy Prongay & Murray LLP
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
Telephone: (310) 201-9150
Facsimile: (310) 201-9160
lglancy@glancylaw.com
rprongay@glancylaw.com
clinehan@glancylaw.com

**DEFENDANT ENDURANCE
INTERNATIONAL GROUP HOLDINGS,
INC.**

By: /s/ John J. Butts
William H. Paine (BBO #550506)
John J. Butts (BBO #643201)
Peter A. Spaeth (BBO #545202)
Andrew S. Dulberg (BBO #675405)
Wilmer Cutler Pickering Hale & Dorr LLP
60 State Street
Boston, MA 02109
617 526-6000 (t)
617 526-5000 (f)
william.paine@wilmerhale.com
john.butts@wilmerhale.com
peter.spaeth@wilmerhale.com
andrew.dulberg@wilmerhale.com

DEFENDANT HARI RAVICHANDRAN

By: /s/ Mark W. Pearlstein
Mark W. Pearlstein (BBO # 542064)
Laura McLane (BBO # 644573)
McDermott Will & Emery LLP
28 State Street
Boston, MA 02109
Telephone: (617) 535-4000
Facsimile: (617) 535-3800
mpearlstein@mwe.com
lmclane@mwe.com

DEFENDANT TIVANKA ELLAWALA

By: /s/ Matthew N. Kane
Matthew N. Kane (BBO# 636801)
Donnelly, Conroy & Gelhaar, LLP
260 Franklin St., Suite 1600
Boston, MA 02110
Telephone: (617) 720-2880
Facsimile: (617) 720-3554
mnk@dcgllaw.com

CERTIFICATE OF SERVICE

I, John J. Butts, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) dated May 7, 2018.

/s/ John J. Butts _____
John J. Butts